

In the United States District Court
For the Northern District of Illinois
Eastern Division

Plaintiff name(s),) Case No.:
)
Jing Li)
)
Kai Zhang)
)
Shanshou He)
)
Tingting Wang)
)
Xiao Huang	
Ziqi Wang	
Fen Peng	
Aixiang Zeng	
Huihong Shen	
Xinguo Yin	

vs.

Defendant

Greer, Burns, & Crain, LTD
300 South Wacker Drive
Suite 2500
Chicago, IL 60606

Defendant

COMPLIANT

1 Greer, Burns, & Crain, LTD is a law firm located in Chicago, Illinois. Greer, Burns,
2 and Crain, LTD will be referred to as "GBC" moving forward. Over the past few years
3 GBC has maliciously prosecuted and used abuse of power tactics against Plaintiff's
4 based in China. Falsely prosecuting Plaintiff's on Trademark Infringement. GBC failed
5 to investigate these allegations. GBC does a general sweep of online stores (Ex.
6 AliExpress) using abuse of power by assuming most merchandise is counterfeit. GBC
7 takes control of the website link, freezes PayPal or Merchant account associated with
8 Website, and failing to give the Plaintiff adequate time to find US Counsel. After
9 causing havoc for the Plaintiff GBC then sends an extortion email to the Plaintiff-
10 making them agree to forfeit 50% of their merchant account balance GBC then unlocks
11 the PayPal and website merchant can then do business as usual after they pay GBC
12 ransom.

13
14 Prayer for Relief

15
16 Plaintiff's Prays for Eight Million Dollars in relief for revenue already lost, and
17 revenue they continue to lose because of the Abuse of Power from GBC. Plaintiff is
18 also requesting a restraining order against GBC from shutting down any merchant
19 accounts, and PayPal accounts.

20
21 Certification and Closing

22 Under Federal Rule of Civil Procedure 11, by signing below I certify to the best of my
23 knowledge, information, and belief that this compliant (1) is not being presented for
24 improper purposes, such as to harass, cause unnecessary delay or needlessly increase
25 the cost of litigation (2) is supported by existing law or by nonfrivolous argument
26 for extending, modifying or reversing existing law (3) the factual contentions have
27 evidentiary support or, if specifically so identified, will likely have evidentiary
28 support after a reasonable opportunity for further investigation or discovery; and (4)
the compliant otherwise complies with Rule 11.

Date Signed

Signature

Printed Name

Dated this 8th day of May 2018

Firm's name and addresss
Names of attorney(s)